

MAYNARD, O'CONNOR, SMITH & CATALINOTTO, LLP

By: Justin W. Gray, Esq.

**Attorneys for Creditor, Benedicto Sorto**

6 Tower Place, Albany, New York 12203

Telephone: (518) 465-3553

Facsimile: (518) 465-5845

E-mail: [gray@moscllp.com](mailto:gray@moscllp.com)

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

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In re:

**NEW ENGLAND MOTOR FREIGHT, INC.,**  
et al.<sup>1</sup>

Debtors.

**Chapter 11**

**Case No. 19-12809-JKS**

Jointly Administered

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**CREDITOR, BENEDICTO SORTO'S REQUEST FOR ASSIGNMENT OF MEDIATOR**

Benedicto Sorto, creditor/holder of an Auto Liability Claim, by and through his undersigned counsel, pursuant to the Auto Liability Claims Protocol Settlement Agreement, hereby requests that that Court appoint a qualified mediator of its own choosing. On September 21, 2020, the undersigned requested that this matter be referred to mediation, and that Protective Insurance operate in good faith to select a mediator. Despite multiple requests, Protective continues to ignore all requests to negotiate and/or mediate this matter. Therefore, on behalf of Mr. Sorto, we request that the Court appoint a qualified mediator so that such mediation can be completed in accordance with the Protocol.

Dated: October 7, 2020

**MAYNARD, O'CONNOR, SMITH &  
CATALINOTTO, LLP**

By: *Justin W. Gray*

Justin W. Gray, Esq.

Attorneys for Benedicto Sorto

6 Tower Place

Albany, New York 12203

(518) 465-3553

[gray@moscllp.com](mailto:gray@moscllp.com)

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<sup>1</sup> The Debtors in these chapter 11 cases and the last four digits of each Debtor's taxpayer identification number are as follows: New England Motor Freight, Inc. (7697); Eastern Freight Ways, Inc. (3461); NEMF World Transport, Inc. (2777); Apex Logistics, Inc. (5347); Jans Leasing Corp. (9009); Carrier Industries, Inc. (9223); Myar, LLC (4357); MyJon, LLC (7305); Hollywood Avenue Solar, LLC (2206); United Express Solar, LLC (1126); and NEMF Logistics, LLC (4666).